

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

**STRUDEL HOLDINGS LLC and
AVR AH LLC,**

Debtors.¹

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Chapter 11

Case No. 23-90757 (CML)

(Jointly Administered)

NOTICE OF WINNING BID AND BACK-UP BID

[Relates to Doc. No. 53]

PLEASE TAKE NOTICE that, on August 10, 2023, the Court entered the *Order (I) Approving the Bidding Procedures, (II) Scheduling Certain Dates with Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving Contract Assumption and Assignment Procedures, and (V) Granting Related Relief* (Doc. No. 53) (the “Bidding Procedures Order”);²

PLEASE TAKE FURTHER NOTICE that, on September 21, 2023, the Court entered the *Stipulation and Agreed Order Regarding Motion Seeking Entry of an Order Precluding Certain Alleged Secured Parties from Submitting Credit Bids Pursuant to Section 105(a) and 363(k) of the Bankruptcy Code* (the “Agreed Order”) (Doc. No. 140);

PLEASE TAKE FURTHER NOTICE that, pursuant to the Bidding Procedures Order, the Debtors commenced the Auction October 4, 2023;

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: AVR AH LLC (0148) and Strudel Holdings LLC (5426). The Debtors’ service address is: PO Box 4068, Aspen, CO 81612.

² All capitalized terms not specifically defined in this Notice are ascribed the meaning given them in the Bidding Procedures Order.

PLEASE TAKE FURTHER NOTICE that the Lender Parties (as defined in the Agreed Order) submitted a credit bid in the amount of \$28.5 million (the “Lender Bid”);

PLEASE TAKE FURTHER NOTICE that Fleeger Family First LP submitted a cash bid in the amount of \$28 million (the “Fleeger Bid”);

PLEASE TAKE FURTHER NOTICE that the Debtors have declared the Lender Bid as the Winning Bid in accordance with the Bidding Procedures Order;

PLEASE TAKE FURTHER NOTICE that the Debtors have declared the Fleeger Bid as the Back-Up Bid in accordance with the Bidding Procedures Order;

PLEASE TAKE FURTHER NOTICE that the hearing to approve the sale currently scheduled for October 5, 2023 at 2:00 p.m. shall be treated as a status conference; and

PLEASE TAKE FURTHER NOTICE that the deadline for filing objections to the Winning Bid shall be abated pending further Court order scheduling a sale hearing and setting a new objection deadline.

Dated: October 4, 2023.

Respectfully submitted,

/s/ Joshua W. Wolfshohl

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Counsel for the Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading has been served by ECF on all parties appearing in the case on this the 4th day of October, 2023.

/s/ Joshua W. Wolfshohl
Joshua W. Wolfshohl